

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division

SHANE M. JENKINS, et al.,

Plaintiffs,

Case No. 2:19-cv-00271

v.

WAL-MART STORES, INC.,

Defendant.

DECLARATION OF MARIA FAITH

I, Maria Faith, declare the following:

1. I am over the age of eighteen years old and competent to testify as to the matters in this Declaration.
2. I am a Walmart employee who currently works at Walmart Store No. 1524, located at 12000 Iron Bridge Rd., Chester, VA 23831.
3. I previously served as an Asset Protection Manager at Walmart Store No. 1424, which is located at 671 Southpark Blvd., Colonial Heights, VA 23834.
4. I responded to a June 16, 2018 incident involving Plaintiff Shane Jenkins (“Jenkins”) while working as an Asset Protection Manager at Store No. 1424.
5. I have reviewed video footage from the parking lot at Walmart Store No. 1424 on June 16, 2018 (Attached as **Exhibit B**) that shows Mr. Jenkins leaving the store.
6. That video footage is true and accurate footage of Walmart Store No. 1424 on June 16, 2018 from 10:55:19 AM to 10:59:36 AM, it was recorded in the course of Walmart’s business

in Walmart's usual practice, and it was recorded contemporaneously and kept in the regular course of business.

7. As part of my duties as Asset Protection Manager, I had knowledge of how the video was recorded and stored at Store No. 1424.

8. In the video, at approximately 10:55:35 AM, a man wearing a yellow Walmart vest can be seen coming out of Walmart. That man is Marvin Webb.

9. At the time of this incident, Marvin Webb was an on-duty door greeter at Walmart Store No. 1424.

10. Marvin Webb was over 80 years old at the time of this incident and passed away on December 28, 2019.

11. At the time of this incident, this particular store (Store No. 1424) was known by Walmart asset protection associates and managers and Walmart "greeters" as having a lot of "wo-pos" or "walk outs," where shoppers push carts with un-bagged merchandise past greeters and out of the store in an attempt to leave without paying.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 14, 2021.

Maria Faith
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